

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 5:20-cr-298 (DNH)

**JOHN ZOURDOS, HELEN ZOURDOS, and
DIMITRIOS ZOURDOS,**

Defendants.

**EVIDENCE LIST OF DEFENDANTS JOHN ZOURDOS,
HELEN ZOURDOS AND DIMITRIOS ZOURDOS**

Defendants John Zourdos, Helen Zourdos, and Dimitrios Zourdos intend to use the following evidence in connection with the trial scheduled for November 1, 2021. Defendants reserve the right to amend their witness list include additional exhibits and summaries.

Exhibit No.	Marked for Identification	Admitted into Evidence	Admissibility	Authenticity	Exhibit Description
D-1					2013 HZ Dippin Donuts, Inc. Tax Returns
D-2					2014 HZ Dippin Donuts, Inc. Tax Returns
D-3					2015 HZ Dippin Donuts, Inc. Tax Returns
D-4					2016 HZ Dippin Donuts, Inc. Tax Returns
D-5					2017 HZ Dippin Donuts, Inc. Tax Returns
D-6					2013 RDZ Dippin Donuts, Inc. Tax Returns
D-7					2014 RDZ Dippin Donuts, Inc. Tax Returns
D-8					2015 RDZ Dippin Donuts, Inc. Tax Returns

Exhibit No.	Marked for Identification	Admitted into Evidence	Admissibility	Authenticity	Exhibit Description
D-9					2016 RDZ Dippin Donuts, Inc. Tax Returns
D-10					2017 RDZ Dippin Donuts, Inc. Tax Returns
D-11					2013 Dimitrious Zourdos Tax Return
D-12					2014 Dimitrious Zourdos Tax Return
D-13					2015 Dimitrious Zourdos Tax Return
D-14					2016 Dimitrious Zourdos Tax Return
D-15					2017 Dimitrious Zourdos Tax Return
D-16					2013 John and Helen Zourdos Tax Returns
D-17					2014 John and Helen Zourdos Tax Returns
D-18					2015 John and Helen Zourdos Tax Returns
D-19					2016 John and Helen Zourdos Tax Returns
D-20					2017 John and Helen Zourdos Tax Returns
D-21					HZ Dippin Donuts, Inc. Bank Statements Account #1341
D-22					RDZ Dippin Donuts, Inc. Bank Statements Account #7122
D-23					ERD Empire, Inc. Bank Statements Account #4229
D-24					John and Helen Zourdos NBT Checking Acct. #4869
D-25					John Zourdos Berkshire Savings Account #3127
D-26					John Zourdos Berkshire Checking Account #9466
D-27					John Zourdos Business Checking Account #1634
D-28					Helen Zourdos Berkshire Savings Account #1468

Exhibit No.	Marked for Identification	Admitted into Evidence	Admissibility	Authenticity	Exhibit Description
D-29					Helen Zourdos Berkshire Checking Account #3213
D-30					Helen Zourdos Berkshire Savings Account #6954
D-31					Helen Zourdos Money Market Account #0074
D-32					Helen Zourdos First Niagara Checking Account #4975
D-33					Dimitrious and Helen Berkshire Savings Acct #4103
D-34					Dimitrious and Helen Berkshire Savings Acct #3373
D-35					Dimitrious and John Zourdos NBT Bank Checking Account
D-36					Dimitrious Zourdos Berkshire Checking Account #3650
D-37					Rose and Helen Zourdos Berkshire Savings Account #0124
D-38					Rose Zourdos Berkshire Checking Account #3559
D-39					Rose Zourdos Berkshire Checking Account #8202
D-40					Rose Zourdos Berkshire Checking Account #8883
D-41					Rose Zourdos Berkshire Savings Account #4124
D-42					Rose Zourdos Berkshire Savings Account #7500
D-43					Rose Zourdos NBT Checking Account #5756
D-44					Helen Zourdos and Chrisanthi Tsionas Certificate of Deposit #1680
D-45					Helen Zourdos and Chrisanthi Tsionas Certificate of Deposit #3600
D-46					Helen Zourdos and Chrisanthi Tsionas Certificate of Deposit #3810

Exhibit No.	Marked for Identification	Admitted into Evidence	Admissibility	Authenticity	Exhibit Description
D-47					Helen Zourdos and Chrisanthi Tsionas Certificate of Deposit #7511
D-48					Chrisanthi Tsionas Berkshire Savings Account #6376
D-49					Bank Statements provided in Gilroy Materials
D-50					Internal Revenue Service Report
D-51					2012 Calendar Book ERD Empire, Inc.
D-52					2012 Calendar Book HZ Dippin Donuts, Inc.
D-53					2012 Calendar Book RDZ Dippin Donuts, Inc.
D-54					2013 Calendar Book ERD Empire, Inc.
D-55					2013 Calendar Book HZ Dippin Donuts, Inc.
D-56					2013 Calendar Book RDZ Dippin Donuts, Inc.
D-57					2014 Calendar Book ERD Empire, Inc.
D-58					2014 Calendar Book HZ Dippin Donuts, Inc.
D-59					2014 Calendar Book RDZ Dippin Donuts, Inc.
D-60					2015 Calendar Book ERD Empire, Inc.
D-61					2015 Calendar Book HZ Dippin Donuts, Inc.
D-62					2015 Calendar Book RDZ Dippin Donuts, Inc.
D-63					2016 Calendar Book ERD Empire, Inc.
D-64					2016 Calendar Book HZ Dippin Donuts, Inc.
D-65					2016 Calendar Book RDZ Dippin Donuts, Inc.
D-66					2017 Calendar Book ERD Empire, Inc.

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D-67					2017 Calendar Book HZ Dippin Donuts, Inc.
D-68					2017 Calendar Book RDZ Dippin Donuts, Inc.
D-69					Composite E-mails between Heather O'Rourke and Helen Zourdos
D-70					Composite E-mails between Heather O'Rourke and Berkshire Bank
D-71					Financial Statements Prepared by Vincent Gilroy, Jr., CPA
D-72					Summary Exhibit: Cancelled Checks
D-73					Summary Exhibit: QuickBooks Report of Independent Contractors and Vendors
D-74					Summary Exhibit: Form 1120 (with schedules)
D-75					Summary Exhibit: Corporate Bank Accounts Deposits and Withdrawals
D-76					Summary Exhibits: Personal Bank Accounts Deposits and Withdrawals
D-77					Treasury Department Circular 230: Regulations Governing Practice before the IRS
D-78					New York State Education Department: Office of the Professions, Laws, Rules, and Regulations Education Law Title VIII, Article 149 Public Accountancy Rules of the Board of Regents: Part 29 Unprofessional Conduct Commissioner's Regulations: Part 70 Public Accountancy

Exhibit No.	Marked for Identification	Admitted into Evidence	Admissibility	Authenticity	Exhibit Description
D-79					John and Dimitrious Zourdos Americu Bank Account Statements #6148
D-80					Internal Revenue Manual 4.10.4-Examination of Income
D-81					Summary Exhibit: Form 1040 (with schedules)
					All documents identified on Exhibit List submitted by the United States

Dated: October 22, 2021

DAVID M. GARVIN, P.A.

BARCLAY DAMON LLP

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